

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x 07 CIV 9547 (SHS)

JOHN D. SAMUEL,

Plaintiff,

-against-

JP MORGAN CHASE BANK, THOMAS ENGLE,  
and AL CARPETTO

Defendant.

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**PLAINTIFF JOHN D. SAMUEL'S INITIAL DISCLOSURES**

Pursuant to Rule 26(a) (1) of the Federal Rules of Civil Procedure, Plaintiff John D. Samuel ("Samuel") hereby submits his Initial Disclosures. In providing these disclosures, Samuel does not waive any objections that may be made regarding the production, use, or admissibility of the materials identified. To the extent further information relevant to these disclosures is obtained, Plaintiff will promptly provide the information to Defendants.

**A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of information.**

Individuals likely to have discoverable information related to the Plaintiff's claims of a hostile work environment, denial of terms and conditions and retaliation at JP Morgan Chase Bank are:

Caroline Cunningham, current or former employee of JP Morgan Chase Bank;

Ivy Tsui, current or former employee of JP Morgan Chase Bank;

Frank Fogliano, current or former employee of JP Morgan Chase Bank;

Paul Trupia, current or former employee of JP Morgan Chase Bank;

Victor Nigro, current or former employee of JP Morgan Chase Bank;

Michael Fossaceca, current or former employee of JP Morgan Chase Bank;

Dzintra Austerlade, current or former employee of JP Morgan Chase Bank;

Melissa Howard, current or former employee of JP Morgan Chase Bank;

Frankie Lam, current or former employee of JP Morgan Chase Bank;

Susan Chu, current or former employee of JP Morgan Chase Bank;

Cornell Pinkney, current or former employee of JP Morgan Chase Bank;

Carl Shismanian, current or former employee of JP Morgan Chase Bank;

Grace Delia, current or former employee of JP Morgan Chase Bank;

Sonia Ashwood, current or former employee of JP Morgan Chase Bank;

Tim Marek, current or former employee of JP Morgan Chase Bank;

Shawn Barrett, current or former employee of JP Morgan Chase Bank;

Steve Wilder, current or former employee of JP Morgan Chase Bank;

Richard Murray, current or former employee of JP Morgan Chase Bank;

Casey Meskers, current or former employee of JP Morgan Chase Bank;

Jeremy Edwards, current or former employee of JP Morgan Chase Bank;

Lori Hrick, current or former employee of JP Morgan Chase Bank;

Jae Kim, current or former employee of JP Morgan Chase Bank;

Gary Schechter, current or former employee of JP Morgan Chase Bank;

Michael Wolf, current or former employee of JP Morgan Chase Bank; and

Dr. Jeffrey Shaw, (212) 986-5571, possesses information relating to Plaintiff's emotional distress.

**B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

(i) Medical records of Dr. Jeffrey Shaw (212) 986-5571;

(ii) All documents submitted to the EEOC in reference to the matter captioned John

D. Samuel v. JP Morgan Chase bearing Charge Number 520-2007-01558; and

(iii) JPMorgan Chase severance agreement offered to the Plaintiff.

**C. A computation of any category of damages claimed by the disclosing party, making available for inspection any copying, as under Rule 34, the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of the injuries suffered:**

Plaintiff John D. Samuel seeks back pay in the amount of \$779,755.60.

Plaintiff seeks \$507,000.00 in front pay.

Plaintiff seeks \$350,000.00 for emotional distress damages.

Plaintiff seeks \$13,350.00 for reasonable legal fees incurred to date.

Plaintiff seeks \$5,000,000.00 in punitive damages.

**D. For inspection and copying, under Rule 34, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

No such insurance agreement exists.

Dated: New York, New York  
December 21, 2007

Respectfully submitted,  
Mark B. Stumer & Associates, P.C.



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Mark B. Stumer, Esq. (MBS-6027)  
Attorney for Plaintiff  
200 Park Avenue South, Suite 1511  
New York, New York 10003  
(212) 633-2225

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**AFFIDAVIT OF SERVICE**

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Shira Marshall, being duly sworn, deposes and says:

1. That I am not a party to the above entitled action; I am over the age of 18; and I am a legal assistance employed with the law firm of Mark B. Stumer & Associates, P.C..

2. That on the 21<sup>st</sup> day of December 2007, I deposited a copy of the annexed PLAINTFF JOHN D. SAMUEL'S INTIAL DISCLOSURES in the above entitled action, copies of which are annexed hereto, enclosed in a first class wrapper, with proper postage addressed to: Stacey Blecher, Esq., JPMorgan Chase Legal Department, One Chase Manhattan Plaza, Floor 26, New York, New York 10081, in an official Postal deposit box located in the City of New York, State of New York under the exclusive care and custody of the United States Post Office Department.

  
Shira Marshall

Sworn to before me this 21<sup>st</sup> day of  
December, 2007;

  
Notary Public

MARK B. STUMER  
Notary Public, State of New York  
No. 02ST5044470  
Qualified in New York County  
Commission Expires May 30, 2011